

BRUCELLOSIS IN OTHER WILD UNGULATES (ELK)

1,229 comments. Most comments express wonder why other wild ungulates are being ignored when they are known carriers of brucellosis. Other comments question if bison are being controlled in order to prevent the spread of brucellosis, will not elk, antelope and other ungulates become subject to control programs similar to the bison. Another issue is fear that brucellosis can never be eradicated when the disease pool in a variety of species is so large. Comments pointed out that certain brucellosis control programs would not be acceptable to all constituencies (cattle lobby, hunting lobby, etc.).

Comment 1

“The EIS makes a commitment to eradicate brucellosis in the park bison. This outcome is highly unlikely since brucellosis is endemic in the 30,000 elk in the park and the 100,000 elk in the Greater Yellowstone Ecosystem. If the likelihood of the spread of brucellosis from wildlife to livestock is so high, why haven’t the surrounding states done something about their elk!...” - Individual, Federal Way, WA, YELL-12025.

Comment 2

“...the Objectives and Constraints in Taking Action dictates ‘Commit to the eventual elimination of brucellosis in bison and other wildlife.’ Point-in-fact, the [definition] of wildlife is for them to exist without genetic manipulation or other interference in evolutionary processes by man.” - Individual, Murray, UT, YELL-10520.

Comment 3

“...other animals that carry brucellosis are allowed to mingle with cattle with no drastic effects, why is it an issue? We don’t and shouldn’t control the movement of elk that carry brucellosis, why control bison?” - Individual, Charlotte, NC, YELL-10561.

Comment 4

“We already know that elk, as well as bison, carry the disease brucellosis. Eradication of the disease in wildlife should not and cannot be the goal. The goal should be the control of disease in cattle. This is something that can be quite easily controlled with existing vaccines.” - Individual, Draper, UT, YELL-10393.

Comment 5

“...Buffalo aren’t the only carriers of brucellosis. It is in deer, swine, and elk, which the state of Montana has been entertaining for a hundred years. All ungulates, hoofed animals, to some

degree, are carriers. There's even been evidence of brucellosis in coyotes, fish, and birds. It might be that this bacteria is an endemic part of the ecosystem. We may be trying to wipe out something that is very natural!" - Individual, Chicago, IL, YELL-4855.

Comment 6

"As for the brucellosis infected elk herds in Wyoming, oral vaccines must immediately be developed for use on the feed grounds and feeding of elk in the GYA should be phased out in the long term. As this is accomplished, brucellosis will be eradicated from the GYA, the risk of transmission to livestock will be acceptable and the bison will be free roaming to the extent that it is feasibly possible and allowed by the Fish and Game Departments of the surrounding states." - Business, Hagenbarth Livestock, YELL-10638.

PREDATORS AND SCAVENGERS/UNGULATES

148 comments. Commentors raised the issue of the relationship between the bison herd and predators and scavengers that also populate the Yellowstone ecosystem. Many comments indicated that increases or decreases in the bison population would have direct or indirect effects on the populations of scavengers and predators. Approximately 20 comments urged the natural control of bison numbers through predation, but no comments stated that natural predation was a problem in any way. Related comments can be found in WILDLIFE - Threatened and Endangered Species and BISON - Ecology.

Comment 1

"To reduce the bear population and wolf population by unnaturally reducing the bison herd is unthinkable." - Individual, Denver, CO, YELL-10001.

Comment 2

"Natural regulation is the best way to manage wild animals. Predators, winter, and other factors in the ecosystem are more suited to efficiently culling the herds." - Individual, Baltimore, MD, YELL-10503.

Comment 3

"If the weather is too extreme and they die natural deaths, they provide food for grizzlies, wolves, and wolverines, all endangered species locally." - Individual, Los Angeles, CA, YELL-15568.

Comment 4

“...another concern involves the predators of the bison. If more bison are slaughtered, then what do the predators eat? The livestock? If this is true, then what happens to the wolves and grizzlies? When does the killing end?” - Individual, Otsego, MN, YELL-13294.

Comment 5

“... bison movement and resource utilization outside of the park should be studied to determine their carrying capacity. And in that study there should be incorporated the effects of the recently reintroduced wolf population and its expansion, and their role as a primary predator on the bison herd.” - Organization, Sierra Club, MN State Director, YELL-15296.

Comment 6

“...bison presumably provide an important source of carrion for wolverines, provided that they can avoid the grizzly bears and wolves who are seeking the same carcasses. We are concerned that any management proposals that will result in decreased numbers and distribution of bison will negatively affect each of these predator species in the GYE.” - Organization, Predator Project, YELL-15332.

THREATENED AND ENDANGERED SPECIES

386 comments. Comments varied greatly except for the following themes. First, the bison is an important part of the grizzly bear diet within Yellowstone National Park. Second, all threatened and endangered species should receive full protection under the Endangered Species Act. Several comments also indicated that the bison should be protected from extinction. The final set of comments stated that the bison should be listed as a protected species. Responses were typically critical of the removal of carrion from Yellowstone National Park. Reference was also made to the lack in the DEIS of discussion of impacts to salmonid species in area streams. Other comments referred to the lack of formal consultation with the U.S. Fish and Wildlife Service related to the Endangered Species Act. Several comments also referred to “co-existing” with the bison. Related comments can be found in [Predators and Scavengers/Ungulates](#).

Comment 1

“The scientific evidence seems clear that bison are a significant part of the diet of grizzly bears. Bison management proposals that reduce the bison population will reduce the amount of bison meat available for bear consumption. This will cause direct reduction in the bear population as well as an increase in bear-human conflicts and human caused grizzly bear mortalities. Any reduction of available bison meat may be particularly significant in light of the possible reduction in the availability of two other important food sources for the bears, the whitebark pine seeds and Yellowstone cutthroat trout. So choosing bison management alternatives that strengthen the bison

population would likely strengthen the recovery of the Yellowstone grizzly bear” - Individual, Seattle, WA, YELL-11486.

Comment 2

“ ...they should be protected as an endangered species until they have been given a chance to return to former self-sustaining levels. - Individual, Newton, MA, YELL-15553.

Comment 3

All TES species must receive full protection afforded them under the Endangered Species Act for listed species. No exceptions” - Individual, Roseburg, OR, YELL-3500.

Comment 4

“In the 19th century the bison were hunted and killed almost to the point of extinction. This was the result of an intentional policy of the U.S. government.” - Individual, Bellflower, CA, YELL-7006.

Comment 5

“At Yellowstone, the removal of dozens or even hundreds of bison every year will have repercussions throughout the ecosystem, notably harming predator and scavenger species, including species protected under the Endangered Species Act, such as grizzly bears and wolves. The low ceiling set by the Preferred Alternative will exacerbate that effect, denying these predators of the occasional bounty of bison and bison carcasses.” - Organization, U.S. Humane Society, YELL-10575.

Comment 6

“Sensitive, Threatened and Endangered Species Were Not Adequately Analyzed. Neither black-tailed prairie dog nor the black-footed ferret have been addressed in the DEIS. Recently petitioned for listing under the Endangered Species Act, Black-tailed prairie dogs evolved with the bison in a classic symbiotic relationship. Research shows that bison prefer feeding on prairie dog towns, if they have a choice and prairie dogs prefer ground that is disturbed by bison. In addition, since prairie dogs occur in YNP, the possibility of restoring the Federally listed black-footed ferret exists. Again, the discussion on the impacts to gray wolves, canis lupus, merits little authoritative discourse and the mitigation measures are inadequate. Thus, the DEIS needs to address these additional species and the impact upon them a result of any bison management plan.” - Organization, Sinapu, YELL-13464.

Comment 7

“By allowing trail grooming and snowmobiling, the agencies may be in violation of the Endangered Species Act (ESA). Section 9 of the ESA makes it unlawful for any person subject to the jurisdiction of the United States to take any endangered species within the United States. Section 3 defines the term ‘take’ as follows: ‘the term take means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.’ By allowing trail grooming, more bison are surviving through the winter and this reduces the amount of carrion available to bear through natural winter kill. Under the definition of ‘harm’, this may constitute an act that significantly impairs feeding.” - Individual, no location, YELL-11532.

Comment 8

“Your draft EIS lists some possible effects on other animals in the ecosystem, especially the endangered grizzly bear and grey wolf. All of the seven listed alternatives could potentially disturb these species.” - Individual, Germantown, MD, YELL-10557.

Comment 9

“The DEIS fails to address salmonid species that are currently being considered for listing under the ESA. These species currently inhabit streams whose headwaters are within YNP. The impact of listing these species could have serious implications to management strategies contained in a number of the alternatives.” - Individual, La Porte, IN, YELL-14379.

Comment 10

“... Given the foregoing analysis, it is clear that the “may affect” standard is clearly met, thus requiring formal consultation with the FWS [over the potential impacts of winter activities on the grizzly bear]...” - Business, Schubert & Associates for Fund for Animals, YELL-14714.

Comment 11

“Please find a way to co-exist with the buffalo. If we do not we may have another extinct species on our hands.” - Individual, Del Mar, CA, YELL-12075.

Comment 12

“The department of livestock has been documented this last spring hazing the bison off Horse Butte by the use of helicopter, horses, and ATV’s. This operation caused high impact on the environment, including bald eagle nesting areas, and had adverse impacts on the bison. A bald eagle closure area was violated by the Department of Livestock when a helicopter flew over the area and horses and ATVs were driven through the area.” - Organization, Cold Mountain, Cold Rivers, YELL-15366.

Comment 13

“The Stephens Creek buffalo capture facility, located at the northern entrance to the Yellowstone National Park, already has caused adverse impacts to the pronghorn antelope population, blocking migration patterns and causing confusion when they flee from predators. This facility would still be used in the preferred alternative, causing further disturbances in the pronghorn antelope population.” - Organization, The Ecology Center, YELL-15575.

Comment 14

“...normally, animal species of concern to the U.S. Government are afforded protection both on and off public lands in recognition of their importance to future generations. The proposed management plan will have the effect of weakening present legislation to protect our disappearing flora and fauna. Could your team please include in your analysis of the impact of other wildlife species [on the possibility of] setting a legal precedent to control and contain sensitive animal species within the boundary of public lands?” - Individual, Santa Cruz, CA, YELL-4208.